

Via Electronic Filing

December 5, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: Notice of Ex Parte Presentation – CG Docket No. 16-145 and GN Docket No. 15-178

Dear Ms. Dortch:

This is to notify you that on December 1, 2016, Julie Kearney, Vice President, Regulatory Affairs, Consumer Technology Association (“CTA”), James Reid, Senior Vice President – Government Affairs, Telecommunications Industry Association (“TIA”), and Jodi Goldberg, Associate Corporate Counsel, Regulatory Affairs, EchoStar Satellite Operating Corporation and Hughes Network System, LLC, together with outside counsel William Maher and Rachel Wolkowitz of Wilkinson Barker Knauer, LLP (collectively, the “Associations”), spoke by phone with Karen Peltz Strauss, Suzy Rosen Singleton, Eliot Greenwald, Robert Aldrich, Rosaline Crawford, and Michael Scott of the Consumer and Governmental Affairs Bureau.

During the meeting, Commission staff and the Associations discussed a number of issues posed in the pending Notice of Proposed Rulemaking (“*NPRM*”) in the above-captioned proceeding.¹ The Associations’ representatives advocated CTA’s and TIA’s positions on those issues, consistent with both CTA’s comments and TIA’s comments on the *NPRM*.²

In particular, the Associations described how flexibility in the rules for implementing RTT and a sufficient implementation period are critical issues to the diverse technology companies that are Association members. The Associations emphasized that the RTT rules should be flexible enough to avoid the need for industry to seek waivers from the Commission in order to deploy advanced technologies. The Associations stated their support for a compliance deadline of December 31, 2018 for manufacturers. They also urged that any implementation timelines take into account the interdependencies of manufacturers and service providers, so that an earlier deadline on services providers does not have the unintended consequence of becoming a *de facto* compliance deadline on manufacturers earlier than December 31, 2018. Consistent

¹ *Transition from TTY to Real-Time Text Technology, Petition for Rulemaking To Update The Commission’s Rules For Access To Support The Transition From TTY to Real-Time Text Technology, And Petition For Waiver of Rules Requiring Support Of TTY Technology*, Notice of Proposed Rulemaking, 31 FCC Rcd 5382 (2016).

² CTA f/k/a Consumer Electronics Association Comments, CG Docket No. 16-145 & GN Docket No. 15-178 (filed July 11, 2016) (“CTA Comments”); TIA Comments, CG Docket No. 16-145 & GN Docket No. 15-178 (filed July 11, 2016).

with its comments, CTA also noted that feature phones and wireline consumer phones present particular challenges to RTT implementation.³

Pursuant to Section 1.1206 of the Commission's rules,⁴ this letter is being electronically filed with your office and a copy of this submission is being provided to the meeting attendees from the Commission. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

Consumer Technology Association

By: /s/ Julie M. Kearney
Julie M. Kearney
Vice President, Regulatory Affairs

1919 S. Eads Street
Arlington, VA 22202
(703) 907-7644

Telecommunications Industry Association

By: /s/ James Reid
James Reid
Senior Vice President, Government
Affairs

1320 N. Courthouse Rd
Suite 200
Arlington, VA 22201
(703) 907-7700

cc: Karen Peltz Strauss
Suzy Rosen Singleton
Eliot Greenwald
Robert Aldrich
Rosaline Crawford
Michael Scott

³ CTA Comments at 3; *see also* TIA Comments at 11.

⁴ 47 C.F.R. § 1.1206.